

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re:)
)
) CASE NO. 18-16422-AMC
Rebecca Core)
) JUDGE Ashley M. Chan
Debtor)
)

**NEW REZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING NOTICE OF
DEBTOR’S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor New Rez LLC d/b/a Shellpoint Mortgage Servicing (“Creditor”), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor’s request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 09/01/20 through 11/01/20. Creditor holds a secured interest in real property commonly known as 7353 N 19TH STREET, PHILADELPHIA, Pennsylvania 19126 as evidenced by claim number 13-1 on the Court’s claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 12/01/20 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance

arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

**Robertson, Anschutz, Schneid & Crane
LLC**

Attorney for Secured Creditor
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Duluth, GA 30097
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By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire
PA Bar Number 314532
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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 13th day of October 2020:

Rebecca Core
7353 N 19th Street
Philadelphia, PA 19126

And via electronic mail to:

John L. McClain
John L. McClain and Associates
P.O. Box 123
Narberth, PA 19072-0123

Scott F. Waterman (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

By: /s/ Kory Jarzyk
Kory Jarzyk
kjarzyk@rascrane.com